

EXHIBIT D

From: Ben Gastel <beng@bsjfirm.com>
Sent: Wednesday, December 23, 2015 1:54 PM
To: Puig, Yvonne K.; 'Chris J. Tardio'; Gerard Stranch
Cc: Chalos, Mark P. (mchalos@lchb.com); Daniel Clayton (dclayton@KCBattys.com); George Nolan (gnolan@leaderbulso.com); Randy Kinnard (rkinnard@KCBattys.com); Bill Leader (bleader@leaderbulso.com); Schramek, Adam T.; C. J. Gideon; Matt H. Cline; Calderon, Daphne
Subject: RE: deposition

Latham treated the following bellwether plaintiffs and examination will cover the following folks:

Sharer
McElwee
Wray
Sullivan
Temple
Brock
Tyree
Reed
Skelton
Berry

We will definitely need all day to cover this number of patients, and we may ne

From: Puig, Yvonne K. [mailto:yvonne.puig@nortonrosefulbright.com]
Sent: Wednesday, December 23, 2015 1:45 PM
To: 'Chris J. Tardio' <chris@gideoncooper.com>; Gerard Stranch <gerards@bsjfirm.com>
Cc: Ben Gastel <beng@bsjfirm.com>; Chalos, Mark P. (mchalos@lchb.com) <mchalos@lchb.com>; Daniel Clayton (dclayton@KCBattys.com) <dclayton@KCBattys.com>; George Nolan (gnolan@leaderbulso.com) <gnolan@leaderbulso.com>; Randy Kinnard (rkinnard@KCBattys.com) <rkinnard@KCBattys.com>; Bill Leader (bleader@leaderbulso.com) <bleader@leaderbulso.com>; Schramek, Adam T. <adam.schramek@nortonrosefulbright.com>; C. J. Gideon <cj@gideoncooper.com>; Matt H. Cline <matt@gideoncooper.com>; Calderon, Daphne <daphne.calderon@nortonrosefulbright.com>
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All: Season's Greetings, and we have a question about Dr. Latham. We are working with his existing vacation and work schedule to offer you dates, but do not have for you today. We need to know the charts/patients upon which he will be examined also. Is your plan to designate a lead questioner and one other to cover all the cases in 7 hours, or how did you envision it will work? Thanks, Yvonne.

From: Chris J. Tardio [mailto:chris@gideoncooper.com]
Sent: Wednesday, December 23, 2015 12:46 PM
To: Gerard Stranch
Cc: Ben Gastel; Chalos, Mark P. (mchalos@lchb.com); Daniel Clayton (dclayton@KCBattys.com); George Nolan (gnolan@leaderbulso.com); Randy Kinnard (rkinnard@KCBattys.com); Bill Leader (bleader@leaderbulso.com); Puig, Yvonne K.; Schramek, Adam T.; C. J. Gideon; Matt H. Cline
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